VIA Electronic Submission to http://www.regulations.gov

August 1, 2011

Michelle Shortt  
Centers for Medicare & Medicaid Services  
Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development  
Attention: Document Identifier/OMB Control Number, Room C4–26–05, 7500  
7500 Security Boulevard  
Baltimore,  
Maryland 21244–1850.


Dear Ms. Shortt:

On behalf of the membership of the Pharmacy e-Health Information Technology Collaborative (Collaborative), we are pleased to submit comments in response to the request for comment Medication Therapy Management Program Improvements—Standardized Format, (76 Fed Reg 31338) published in the Federal Register on May 31, 2011.

The Collaborative recommends that “data requirements” (the information or data that is required to be populated in fields of standardized formats) for medication therapy management (MTM) electronic transactions are incorporated into the “Standardized Format for the Comprehensive Medication Review Action Plan and Personal Medication List Summary”. Examples of such data fields that could be automatically populated from the pharmacy operating system into the standardized form include patient name, allergies, medications, label directions, prescriber name and phone number, pharmacist who provided MTM services name and phone number, date documents/list prepared, and indication if available. This would assure completion of the forms for the patient is driven off existing electronic data elements so that rekeying will not be necessary. This recommendation is supported through the American National Standards Institute (ANSI) Standard Development Organizations including National Council for Prescription Drug Programs(NCPDP), Accredited Standards Committee (ASC X12), and Health Level Seven (HL7) processes to assure Medication Therapy Management Services (MTMS) electronic standard transactions are developed. The Collaborative supports and works...
with these organizations to make certain data elements such as those in the proposed forms are populated from the “Pharmacist EHR” and or other types of interoperable electronic systems.

Furthermore, the Collaborative members’ request clarification on printing formats and if CMS expects standardized forms to be printed in the specific format as presented in the draft or if there is flexibility in how pharmacies can print the forms utilizing their software systems. The Collaborative members’ recommend that CMS consider flexibility in the format of the standardized forms and should allow an electronic media if available.

Formed in the fall of 2010, the Collaborative’s focus is to assure the meaningful use (MU) of standardized electronic health records (EHRs) support safe, efficient, and effective medication use, continuity of care, and provides access to the patient-care services of pharmacists with other members of the interdisciplinary patient-care team.

The Collaborative seeks to ensure that pharmacist-provided patient care services in all practice settings are represented in the MU of EHRs. The Collaborative’s founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education accreditation. The Collaborative’s Associate Members represent e-prescribing networks, a standards development organization, transaction processing networks, pharmacy companies and other organizations that support pharmacists providing patient care services. The Collaborative was founded by nine pharmacy professional associations representing over 250,000 members and includes three associate members from other pharmacy related organizations. For additional information, visit www.pharmacyhit.org

The Collaborative supports Medicare Part D sponsors use pharmacists to summarize the person-to-person comprehensive medication review (CMR) and provide an individualized written or printed summary to the beneficiary. In addition, the Collaborative supports the completion of the forms should be driven off existing electronic data elements so that rekeying will not be necessary.

*****

On behalf of the Pharmacy e-HIT Collaborative, thank you again for the opportunity to comment on the Medication Therapy Management Program Improvements—Standardized Format request for comments. For more information, contact Shelly Spiro, Director, Pharmacy e-HIT Collaborative at shelly@pharmacyhit.org.

Respectfully submitted,

Shelly Spiro
Director, Collaborative
Shelly Spiro, RPh
Director
Pharmacy e-Health Information Technology Collaborative
shelly@pharmacyhit.org

Mark N. Brueckl, RPh, MBA
Assistant Director, Pharmacy Affairs
Academy of Managed Care Pharmacy
mbrueckl@amcp.org

Mike Rouse B.Pharm (Hons); MPS
Assistant Executive Director, Professional Affairs and Director, International Services Accreditation Council for Pharmacy Education (ACPE)
mrouse@acpe-accredit.org

William Lang, MPH
VP Policy and Advocacy
American Association of Colleges of Pharmacy wlang@aaccp.org

C. Edwin Webb, Pharm.D., MPH
Associate Executive Director
Director, Government and Professional Affairs
American College of Clinical Pharmacy ewebb@accp.com

Marcie Bough, PharmD
Senior Director, Government Affairs
American Pharmacists Association mbough@aphanet.org

Lynne Batshon
Director, Government Affairs
American Society of Consultant Pharmacists Lbatshon@ascp.com

Christopher J. Topoleski
Director, Federal Regulatory Affairs
American Society of Health-System Pharmacists
ctopoleski@ashp.org

Kim Swiger, RPh
Vice President, Pharmacy Services
Mirixa Corporation
kswiger@mirixa.com

Rebecca Snead
Executive Vice President & CEO
National Alliance of State Pharmacy Associations
rsnead@naspa.us

Ronna B. Hauser, PharmD
VP Policy and Regulatory Affairs
National Community Pharmacists Association (NCPA)
ronna.hauser@ncpanet.org

Lynne Gilbertson
VP Standards Development
National Council for Prescription Drug Programs (NCPDP)
lgilbertson@ncpdp.org

Stephen Mullenix, RPh
Sr VP, Communications & Industry Relations
National Council for Prescription Drug Programs (NCPDP)
smullenix@ncpdp.org

Roger Pinsonneault, R.Ph.
Sr. Director, Business Development
RelayHealth – Pharmacy Roger.Pinsonneault@RelayHealth.com

Ken Whittemore, Jr., RPh, MBA
Senior VP, Professional & Regulatory Affairs
Surescripts
ken.whittemore@surescripts.com